# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

BENNETT COLLEGE,	)	
Plaintiff,	)	Civil Action No. 1:19-cv-00883- SDG
V.	)	
	)	
THE SOUTHERN ASSOCIATION OF	)	
COLLEGES AND SCHOOLS	)	
COMMISSION ON COLLEGES, INC.,	)	
	)	
Defendant.	)	

## MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant The Southern Association of Colleges and Schools Commission on Colleges, Inc. ("SACSCOC") respectfully requests leave of Court to file under seal the depositions transcripts of Latonya Flamer and Kimberly Ripberger, which are referenced in SACSCOC's Motion for Summary Judgment filed on February 7, 2020 [Dkt. 78], for the reasons set forth in the Memorandum in Support of the Parties' Joint Motion for Leave to File under Seal filed on February 7, 2020 [Dkt. 76-1].

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted this 12th day of February, 2020.

#### /s/ Patrick W. McKee

Patrick W. McKee
Georgia Bar No. 494325
LAW OFFICE OF PATRICK W.
MCKEE, LLC
19 Spring Street
Newnan, GA 30263
Telephone: (770) 683-8900

Facsimile: (770) 683-8905 pwmckee@mckeelaw.com

## /s/ Letitia A. McDonald

Letitia A. McDonald Georgia Bar No. 489430 Lohr Beck-Kemp Georgia Bar No. 828063 J. Matthew Brigman Georgia Bar No. 254905 KING & SPALDING LLP 1180 Peachtree Street Atlanta, Georgia 30309 tmcdonald@kslaw.com lbeck-kemp@kslaw.com mbrigman@kslaw.com alex.gray@kslaw.com Telephone: (404) 572-4600

Facsimile: (404) 572-5139

Attorneys for Defendant The Southern Association of Colleges and Schools Commission on Colleges, Inc.

## **CERTIFICATE OF SERVICE**

This is to certify that I have this day electronically filed the foregoing MOTION FOR LEAVE TO FILE UNDER SEAL with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Derin B. Dickerson Gavin Reinke Jahnisa T. Loadholt Kristi Ramsay ALSTON & BIRD, LLP One Atlantic Center 1201 West Peachtree Street Atlanta, Georgia 30309-3424 (404) 881-7000 (phone) (404) 881-7777 (fax)

Attorneys for Plaintiff Bennett College

This 12th day of February, 2020.

/s/ Letitia A. McDonald Letitia A. McDonald Georgia Bar No. 489430